

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA

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In Re:

Bky. No. 04-51051(GFK)

ARNE DALE ANDERSON

Chap. 7 Case

Debtor.

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**OBJECTION TO MOTION FOR RELIEF FROM STAY**

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TO: GHI Investments and their attorney of record Greg C. Gilbert located at 230 West Superior Street, Suite 800, Duluth, MN 55802:

1. Debtor Arne D. Anderson hereby gives notice of objection to the Movant's Motion for Relief From Stay;

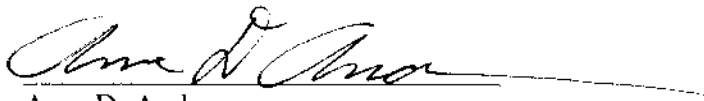
2. Debtor concedes that he has no leasehold interest in the real property upon which the upon which the Debtor's dwelling is situated. However, the dwelling itself is certainly necessary to the reorganization of Debtor's estate;

3. Debtor already has a site to which the dwelling is to be moved. However, for various reasons including lack of funding and unusually rainy weather, the moving of the dwelling to the site has been delayed;

4. However, the excavating and landscaping necessary to prepare the site was completed on September 29 of 2004 by Grover's Excavating and Trucking located at 1671 County Road 4, Twin Lakes, Minnesota;

5. Weather permitting, movement of the dwelling is set for the week of October 4 of 2004. The actual day of the moving will be scheduled on the evening of October 4 of 2004. The person who will be moving the dwelling is a Mr. Dale Sandberg out of Sturgeon Lake. Mr. Sandberg is known to the movant's as person who makes his living by moving such dwellings. Mr. Sandberg has been paid in advance for his services; and

6. Any lack of protection the Movant may have is a direct result of their repeated refusal to accept payment for any and all monies that would be due them until such time as the moving of dwelling can be accomplished in an orderly manner consistent with the reorganization of the estate of the Debtor.

A handwritten signature in cursive script, appearing to read 'Arne D. Anderson', followed by a horizontal line.

Arne D. Anderson

Debtor

P.O. Box 16065

Duluth, MN 55816

218/727-7772

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**AFFIDAVIT OF SERVICE**

STATE OF MINNESOTA)

)ss.

COUNTY OF ST. LOUIS )

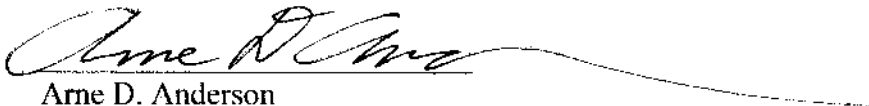
I, Arne D. Anderson, after being sworn upon oath, do state as follows:

1. That on October 1 of 2004, I served the attached:  
Objection to Motion for Relief From Stay; and  
Unsworn Verification and Declaration Regarding Electronic Filing

upon the Movant's attorney of record by hand delivering same to the office of Gregg Gilbert located at 230 West Superior Street, Suite 800, Duluth, MN 55802 and by depositing same in the U.S. Mail and addressed as follows:

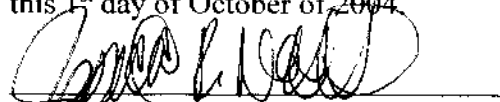
Chapter 7 Trustee  
Office of the U.S. Trustee  
1015 U.S. Courthouse  
300 S. Fourth Street  
Minneapolis, MN 55415

Further your affiant sayeth not.

  
Arne D. Anderson

subscribed and sworn to before me

this 1<sup>st</sup> day of October of 2004.

  
Notary Public



UNITED STATES BANKRUPTCY COURT  
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**UNSWORN VERIFICATION AND DECLARATION REGARDING  
ELECTRONIC FILING**

I, Arne D. Anderson, declare under penalty of perjury:

1. I am the Debtor in the above-captioned matter;
2. I have drafted the Objection to Motion for Relief From Stay to be filed in this matter;  
and
3. I have scanned said Objection, intend to file it electronically file it with the Clerk of  
the Bankruptcy Court, and will retain the original in my file.

October 1, 2004

  
Arne D. Anderson - Debtor